

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

MERRY F. SHANE, ET AL.,

Plaintiffs,

V.

KENNETH E. EDGE, ET AL.,

Defendants.

Civil Action No.: 3:10-cv-50089
(Consolidated with Civil Action No. 3:10-cv-50132)

Honorable Frederick J. Kapala

Mag. Honorable P. Michael Mahoney

**AGREED MOTION FOR EXTENSION OF PAGE LIMITS RELATED TO
PLAINTIFFS' FINAL APPROVAL AND FEE MEMORANDA**

Plaintiffs Merry F. Shane, Michelle Kretsinger and Keith Krestinger (“Plaintiffs”), and Defendants Paula A. Bauer, Lori M. Burke, Russell Campbell, Eleanor Doar, Paul Donovan, Kenneth E. Edge, Guy Francesconi, John Gleeson, John Halbrook, Frederick Hay, William R. McManaman, Steven Rogers, Teresa Inglesias-Solomon, Richard Stiles, Judith Carré Sutfin, Thomas Szmanda, James S. Waddell, Jack Ward, Gary Watson, Donald H. Wilson, Amcore Financial Inc. Advisory Committee, and John Does 1-20 (“Defendants”), by and through their undersigned attorneys, respectfully request to file (1) a Memorandum in Support of Plaintiffs’ Motion for Final Approval of Settlement and Certification of Settlement Class (“Final Approval Memorandum”), and (2) a Memorandum in Support of Plaintiffs’ Motion for Award of Attorneys’ Fees, Reimbursement of Expenses, and Case Contribution Awards (“Fee Memorandum”), in excess of the fifteen (15) page limit set forth in Local Rule 7.1.

In support of the instant motion, Plaintiffs state they intend to file by no later than April 9, 2013, a Final Approval Memorandum that addresses many complex and varied issues that

require detailed explanation and citation, including explanation of the fairness of the proposed settlement, the responses received by Plaintiffs' Counsel to the settlement, if any, the appropriateness of certification of the settlement class, and explanation of the proposed plan of allocation of the settlement.

Additionally, Plaintiffs intend to file by no later than April 9, 2013, a Final Fee Memorandum that will address, in addition to the proposed settlement in this action, the fairness and reasonableness of the fees requested by Plaintiffs' Counsel as well as the requested reimbursement of expenses Plaintiffs' Counsel incurred in litigating the action and reaching the proposed settlement. Moreover, Plaintiffs intend to address the fairness and reasonableness of the requested case contribution awards sought for the Plaintiffs.

Given the inherent complexity of this action, and the requisite showing Plaintiffs must demonstrate to satisfy the standards for final approval of the settlement and approval of attorneys' fees and expenses, Plaintiffs require the additional requested pages to adequately address these issues. Defense Counsel does not oppose the relief sought by the instant motion.

WHEREFORE, Plaintiffs respectfully request leave of Court to file a Final Approval Memorandum and Fee Memorandum not in excess of thirty (30) pages each.

Agreed on this 11th day of March, 2013

**KESSLER TOPAZ
MELTZER & CHECK, LLP**

By: /s/ Mark K. Gyandoh
Edward W. Ciolko
Peter A. Muhic
Mark K. Gyandoh
Julie Siebert-Johnson
280 King of Prussia Road
Radnor, PA 19087
Telephone: 610.667.7706
Facsimile: 610.667.7056
Email: eciolko@ktmc.com
pmuhic@ktmc.com
mgyandoh@ktmc.com
jsjohnson@ktmc.com

Interim Co-Lead Counsel

GAINEY McKENNA & EGGLESTON

By: /s/ Gregory M. Eggleston
Gregory M. Eggleston
440 Park Avenue South, Fifth Floor
New York, NY 10016
Telephone: 212.683.3400
Facsimile: 212.683.3402
Email: gegleston@gme-law.com

Interim Co-Lead Class Counsel

MEYER & HORNING, P.C.

By: /s/ Timothy F. Horning
Timothy F. Horning
3400 North Rockton Avenue
Rockford, IL 61103
Telephone: 815.636.9300
Facsimile: 815.636.9352
Email: thmeyerhorning@aol.com

Interim Liaison Class Counsel

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Kirsten Milton
Charles C. Jackson
Deborah S. Davidson
Kirsten A. Milton
Emily A. Glunz
Morgan, Lewis & Bockius LLP
77 West Wacker Drive, Fifth Floor
Chicago, IL 60601
Telephone: 312.324.1000
Facsimile: 312.324.1001
Email: charles.jackson@morganlewis.com
ddavidson@morganlewis.com
kmilton@morganlewis.com

Attorneys for Defendants

LASKY & RIFKIND, LTD.

Norman Rifkind, Esq.
Leigh R. Lasky, Esq.
351 W. Hubbard Street, Suite 401
Chicago, IL 60654
Telephone: 312.634.0057
Email: rifkind@laskyrifkind.com
lasky&laskyrifkind.com

***Counsel for Plaintiffs Michelle Kretsinger
and Keith Kretsinger***

RIGRODSKY & LONG, P.A.

Seth D. Rigrodsky
Brian D. Long
919 North Market Street, Suite 980
Wilmington, DE 19801
Telephone: 302.295.5310
Facsimile: 302.654.7530
Email: sdr@rigrodskylong.com
bdl@rigrodskylong.com

Timothy J. MacFall
Scott J. Farrell
585 Stewart Avenue, Suite 304
Garden City, NY 11530
Telephone: 516.683.3516
Email: tjm@rigrodskylong.com
sjf@rigrodskylong.com

Counsel for Plaintiff Merry F. Shane

CERTIFICATE OF SERVICE

I hereby certify that on March 11, 2013, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.

/s/ Mark K. Gyandoh
Mark K. Gyandoh